



167951

Solutia Inc.
10300 Olive Boulevard
P.O. Box 66760
St. Louis, Missouri 63166-6760
Tel 314-674-1000

June 25, 1999

To: Mr. Michael McAteer
U. S. EPA - Region 5
77 West Jackson Boulevard (SR-6J)
Chicago, Illinois 60604-3590

Mr. Thomas Martin
Associate Regional Counsel
U. S. EPA - Region 5
77 West Jackson Boulevard (C-14J)
Chicago, Illinois 60604-3590

Ms. Candy Morin
Illinois Environmental Protection Agency
1021 North Grand Avenue East,
P. O. Box 19276
Springfield, Illinois 62794-9276

**Re: Support Sampling Plan for Sauget Sites Area I January 21, 1999
Administrative Order by Consent**

Mr. McAteer, Mr. Martin and Ms. Morin,

On April 8, 1999, Solutia submitted a Support Sampling Plan (SSP) to the U.S. Environmental Protection Agency (Agency) pursuant to the January 21, 1999 Sauget Area I Administrative Order by Consent. Solutia's April 8th submittal was a revision to a February 22, 1999 Support Sampling Plan disapproved by the Agency on March 19, 1999. In a May 29, 1999 letter to Solutia, the Agency commented on and disapproved Solutia's April 8, 1999 SSP and required that Solutia submit "a final plan on or before June 25, 1999". The requested plan is enclosed.

In a June 10th letter to the Agency, Solutia responded to comments in the May 29 disapproval letter relative to the Schedule. Specifically, Solutia objected to the Agency's request to, "...evaluate the Corps of Engineer's schedule and re-order your schedule accordingly". Solutia further stated its position that the Corps's schedule was unrealistic and therefore unreasonable for completion of the current EECA / RIFS Scope of Work.

A request to meet with the Agency to discuss the Schedule was granted and the meeting took place June 22, 1999 in Chicago.

In the June 22nd meeting, Solutia was represented by Bruce Yare and Mike Light and assisted by Jon Dikinas of Montgomery Watson and Rich Bartelt of Arcadis, both experienced in the performance of Superfund studies as well as remedial actions. Solutia met for four hours with Mike McAteer of EPA, Tim Gouger of the Corps and Candy Morin of IEPA and discussed several schedule impacting issues, including the following: the sheer magnitude and comprehensiveness of the current Scope of Work (4,917 discrete samples currently - involving all media - compared to 1309 in the initial scope proposal and a current projected cost in excess of \$3M compared to the Agency's initial estimate of less than \$1M); the multiple stakeholders which must be kept informed and consulted with during the project performance, including the Agencies, the Community, Natural Resource Trustees and the other PRPs; the sensitivity and time consuming nature of communications to convey the need for residential sampling and the interpretation of the results; the need for comprehensive human health and ecological risk assessments and the time required to perform these tasks properly; and finally the need to assure compliance of the Work with the NCP for cost recovery purposes. It appeared to Solutia that there was general concurrence among the meeting participants that these points were valid.

Solutia concluded its presentation with the position that the proposed schedule in the disapproved April 8th SSP submittal represents an extremely aggressive estimate, and that neither Solutia nor its consultants are aware of a project of similar magnitude and complexity - in Region V or elsewhere - being performed in a comparable time. There was no rebuttal to this position. The meeting concluded with Solutia's agreement to incorporate into the SSP Schedule as many concurrent activities as could be well managed. The Agency agreed to consider the scheduling factors discussed in the June 22nd meeting as it evaluates the current SSP Schedule submittal. The Agency also agreed that any removal work of a non-insignificant nature would extend the SSP schedule.

At the insistence of the Agency and over the strong objections of Solutia, this SSP submittal includes the requirement to dig multiple test trenches in waste disposal Sites G, H, I, L & N. Section 5.3 of the SSP requires 20 trenches to confirm the boundaries of the 5 sites and Section 5.6.2 requires a trench within the central area (to-be-defined) of each of the 5 disposal sites to confirm the presence of drums & tanks. The Agency reportedly utilized similar trenching techniques without incident in the 1996 Site G removal activity. However, the contents of Site G are likely to be vastly different from those materials disposed of in Sites H & I. Site G disposal took place in the 50's while Sites H & I were used in the 40's. Furthermore, the only similarly intrusive activity conducted in Sites H & I resulted in an air release and exposure which the Government cited and weighed heavily in its NPL scoring package for Sauget Sites Area I. This 1989 incident resulted from simply drilling a post hole - about 8 feet in depth - on the Site I periphery. The results from trenching could be far more severe.

discuss
w/ Martin
& Solutia

As the Agency is aware, Solutia has attempted to identify all possible materials which might reasonably be expected to have been disposed of at the Sauget Sites. Solutia will take all available precautions to protect its workers from all known hazards. However, Solutia cannot protect its workers from unknowns. It is known that the United States Department of Defense operated a facility in the area for several years during the 40's, in an operation called The Chemical Warfare Service (CWS). Since all raw materials used by CWS were coded and all CWS employees were sworn to secrecy, Solutia has been unable to identify raw materials, intermediates or products from this manufacturing facility and therefore cannot determine what was potentially disposed of in Sites H & I from this operation. The United States Government has thus far been unresponsive to Solutia's FOIA request for this information. Solutia requests that the Agency provide all information on this operation which it or any other U. S. Government agency may possess. The need for this information is urgent and is needed before any trenching in Sites H & I is initiated, so that proper personal protective procedures and equipment can be provided.

Solutia reports the following status of activities which have been proceeding concurrently with the SSP development and approval process: (i) completion and receipt of aerial photos and topography mapping; (ii) approval of the building permit and initiation of construction of an investigatory derived waste storage area; (iii) procurement of access agreements for most sites; and (iv) completion of a culvert (flooding) study.

Finally, the 10 copies of the Human Health Risk Assessment in this submittal were received as single sided copies and are being submitted as received. Also, Laboratory QAPs & SOPs and the Data Validation Plan are not being resubmitted, as no changes to these items were requested.

Solutia and any member of the project team are available to meet with the Agency to review any questions you may have concerning this SSP submittal.

Sincerely,



D. M. Light
Manager, Remedial Projects
Solutia Inc.

cc: J. Nassif, Esq. - Thompson Coburn
L. Tape, Esq. - Thompson Coburn
B. Gilhousen, Esq. - Solutia
M. Foresman - Solutia